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Entered on Docket

June 30, 2020

EDWARD J. EMMONS, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA



Signed and Filed: June 30, 2020

DENNIS MONTALI
U.S. Bankruptcy Judge

16 UNITED STATES BANKRUPTCY COURT
17 NORTHERN DISTRICT OF CALIFORNIA
18 SAN FRANCISCO DIVISION

19 In re:

20 **PG&E CORPORATION,**

21 **- and -**

22 **PACIFIC GAS AND ELECTRIC COMPANY,**

23 **Debtors.**

- 24 Affects PG&E Corporation
 Affects Pacific Gas and Electric Company
 Affects both Debtors

25 * *All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**ORDER APPROVING
STIPULATION ENLARGING
TIME FOR DALE S. WITHROW
AND BEVERLY R. WITHROW,
INDIVIDUALLY AND AS
TRUSTEES FOR THE DALE S.
WITHROW AND BEVERLY R.
WITHROW LIVING TRUST, TO
AMEND PROOF OF CLAIM**

1 The Court having considered the *Stipulation Enlarging Time for Dale S. Withrow and*
2 *Beverly R. Withrow, Individually and as Trustee for the Dale S. Withrow and Beverly R. Withrow*
3 *Living Trust, to Amend Proof of Claim*, dated June 26, 2020 [Dkt. No. 8133] (the “**Stipulation**”),¹
4 entered into by PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the
5 “**Utility**”), as debtors and debtors in possession (collectively, the “**Debtors**”) in the above-
6 captioned cases (the “**Chapter 11 Cases**”), on the one hand, and Dale S. Withrow and Beverly R.
7 Withrow, individually and as Trustees for the Dale S. Withrow and Beverly R. Withrow Living
8 Trust (collectively, the “**Movants**”), on the other hand; and pursuant to such Stipulation and
9 agreement of the Parties, and good cause appearing,

10 IT IS HEREBY ORDERED THAT:

11 1. The Stipulation is approved.
12 2. The Amended Proof of Claim as annexed as Exhibit A to the Motion is deemed
timely filed on the condition that it is filed no later than seven (7) days after the entry of this Order.

14 3. Nothing herein is intended to, nor shall it be construed to be, a waiver by the Debtors
15 or any other party in interest of any right to (i) object to the Asserted Claims or the Amended Proof
16 of Claim on any grounds other than the untimely filing thereof, or (ii) seek to reclassify the
17 Amended Proof of Claim.

18 4. Nothing herein is intended to, nor shall it be construed to be, a waiver by Movants of
19 their right to seek to reclassify the Amended Proof of Claim or to assert any other right in
20 contravention to or in opposition of any asserted challenge to the Asserted Claims or the Amended
21 Proof of Claim.

22 5. Upon the timely filing of the Amended Proof of Claim pursuant to paragraph 1 of the
23 Stipulation, the Original Proof of Claim shall be deemed expunged, and Prime Clerk LLC, the
24 claims agent appointed in the Chapter 11 Cases, shall be authorized to update the official claims
25 register to reflect the terms set forth herein.

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¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them
in the Stipulation.

6. The Motion is deemed withdrawn with prejudice and the Hearing is vacated.

7. The Stipulation is binding on the Parties and each of their successors in interest.

3 8. The Stipulation constitutes the entire agreement and understanding of the Parties
4 relating to the subject matter thereof and supersedes all prior agreements and understandings relating
5 to the subject matter thereof.

6 9. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
7 controversies arising from the Stipulation or this Order.

Dated: June 26, 2020

LEVIN LAW GROUP

/s/ Richard H. Levin

Richard H. Levin, Esq.

Attorneys for Dale S. Withrow and Beverly R. Withrow, Individually and as Trustee for the Dale S. Withrow and Beverly R. Withrow Living Trust

*** END OF ORDER ***